

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG**  
**MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

**PROPOSED ORDER EXCLUDING THE OPINIONS OF  
DEFENDANTS' TOXICOLOGY EXPERTS BROOKE T. MOSSMAN, MS,  
PH.D., KELLY S. TUTTLE, PH.D., AND H. NADIA MOORE, PH.D.**

**THIS MATTER**, having been opened to the Court by Plaintiffs for entry of an order excluding the opinions of Defendants' toxicology experts Brooke T. Mossman, MS, PhD, Kelly S. Tuttle, PhD, and H. Nadia Moore, PhD, and the Court having considered the submissions of the parties and having heard oral argument, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2019,

**ORDERED** as follows:

1. Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Defendants' Toxicology Experts Brooke T. Mossman, MS, PhD, Kelly S. Tuttle, PhD, and H. Nadia Moore, PhD is **GRANTED** in its entirety; and

2. Brooke T. Mossman, MS, PhD, Kelly S. Tuttle, PhD, and H. Nadia Moore, PhD, experts for Defendants, shall be barred from offering their opinions.

---

Hon. Freda L. Wolfson